



Consultation on Climate Change Reporting by Specified Public Bodies - Developing New Regulations

Response Template

March 2023

First, please tell us ‘About You’, to help us analyse the responses

A. (Optional) What is your name?

Francesca Di Palo

B. (Optional) What is your email address?

francesca@sustainableni.org

C. Are you representing an organisation, or are these your personal views?

- I am representing an organisation.
- I am providing my personal views.

If you are representing an organisation, please tell us the name of that organisation.

Sustainable Northern Ireland

D. What area do the functions of your organisation fall under?

Please select one description, which most closely fits the **primary functions** of your organisation.

- Local Council
- North South Implementation Body
- Agriculture / Forestry / Fishing
- Arts / Culture / Sport
- Business / Finance
- Charity / NGO (environmental)
- Charity / NGO (other)
- Education
- Energy
- Health / Emergency Services / Social Care

- Industrial Processes / Manufacturing
- Regulator / Auditor
- Residential / Housing / Built Environment
- Transport / Infrastructure
- Waste Management / Recycling
- Other

If you selected 'Other' - please provide a brief description of your organisation's primary function.

E. What size is your organisation?

We have provided a choice of options below, for you to describe the size of your organisation: by number of staff, by annual budget, and/or described in your own words.

Optional: Your organisation's average number of Full-Time Equivalent (FTE) staff, over the financial year ending March 2022.

- 1 - 9 FTE staff
- 10 - 49 FTE staff
- 50 - 249 FTE staff
- 250 - 499 FTE staff
- 500 or more FTE staff

Optional: Your organisation's approximate annual budget for the financial year ending March 2022.

- Less than £1 million
- Between £1 million and less than £3 million
- Between £3 million and less than £5 million
- Between £5 million and less than £10 million
- Between £10 million and £25 million
- More than £25 million

Optional: Please enter any other metric(s) to describe the size of your organisation, e.g. square footage of estate/premises, fleet size etc.

F. Does your organisation currently report on climate change?

Yes

No

If yes, please tell us the name of the reporting regime/scheme, etc.

If yes, is your participation mandatory, voluntary or both.

Please tick all that apply.

Mandatory

Voluntary

Main Consultation Questions

1. How often do you think specified public bodies should provide their adaptation reports?

- Annually
- Every 2 years
- Every 3 years
- Every 4 years
- Every 5 years*
- Other

(Aligns with the independent expert climate change advice from the CCC - see section 3.4.2 of the full-length consultation document)*

If you chose 'Other' - please tell us HOW OFTEN you think adaptation reporting should be required.

Please tell us your REASONS for your chosen response.

In the European Union, the frequency required to report on climate change adaptation efforts is every two years as part of the reporting requirements under the EU Adaptation Strategy. However, this can change depending on the sector and the level of government and some countries may have their internal timelines for public bodies. The decision to require reporting every two years came from the urgency of addressing the impacts of climate change and the need to avail of up-to-date information on adaptation progress.

Although aware that climate change is (a) a rapidly evolving and complex issue and (b) that regular reporting can help to ensure that decision-makers have access to the most recent and accurate information on adaptation progress, we agree with the CCC best practice recommendation that public bodies should report on their climate change adaptation efforts every five years. This time frame provides a sufficient period between reports and a regular opportunity to assess progress and identify areas for improvement at once. Moreover, it aligns with the reporting requirements set by the Paris Agreement for the National Determined Contribution (NDCs), where each country is expected to submit an updated national climate action plan every five years to the UNFCCC secretariat. It is recognised that the long-term goals specified in Articles 2 and 4.1 will be achieved over time. Additionally, reporting every five years considers the resources and capacity constraints faced by public bodies since reporting on adaptation can be complex and resource-intensive and may burden public bodies unnecessarily.

SNI supports the CCC recommendation of reporting on adaptation every five years also because positive impacts of climate change adaptation can vary depending on the specific adaptation measure. In some cases, an immediate result can be visible, like installing flood defences such as reinforced embankments to reduce flood risk and damage; however, other adaptation measures may take longer to show measurable results. For example, it is the case of reforestation to increase ecosystem resilience with several years or decades to show significant impacts on biodiversity and carbon sequestration, as well as increasing community awareness and building resilience through education and outreach programmes that may not show measurable results in the short term but can be critical in reducing vulnerability in the long run.

2. When should specified public bodies be required to provide their first adaptation report?

- By end of January 2025*
- By end of March 2025*
- Later than March 2025
- Other

(Aligns with the independent expert climate change advice from the CCC - see section 3.4.2 of the full-length consultation document)*

If you chose 'Later than March 2025' or 'Other' - please tell us your SUGGESTED MONTH and YEAR for providing the first adaptation reports.

Please tell us your REASONS for your chosen response.

The first adaptation report should be made available by March 2025, as recommended by the CCC, since the fourth Climate Change Risk Assessment (CCRA) will be published in 2027.

The adaptation reports from specified public bodies will feed into the CCRA4 as evidence of climate risks and opportunities to prevent them. They will also enable the evaluation of appropriate risk management by a public body.

3. How often do you think specified public bodies should provide their mitigation reports?

- Annually
- Every 2 years*
- Every 3 years*
- Every 4 years*
- Every 5 years
- Other

(Aligns with the independent expert climate change advice from the CCC - see section 3.4.2 of the full-length consultation document)*

If you chose 'Other' - please tell us HOW OFTEN you think mitigation reporting should be required.

Please tell us your REASONS for your chosen response.

We agree with the CCC on the point that mitigation reporting should happen more frequently than adaptation reporting because there is a need for more frequent updates on progress towards meeting NI and UK overall emissions reduction targets. It also aligns with the United Framework Convention on Climate Change (UNFCCC) reporting requirements for mitigation.

Based on targets for reducing greenhouse gas emissions set in the Climate Change Act (NI) 2022, regular reporting on emissions every two years will ensure the track of progress and better monitoring to guarantee that appropriate measures and action are taken if necessary. Up-to-date data are essential to inform policy and decision-making and make more informed decisions about mitigation strategies and policies to adopt.

Reporting every two years allows for regular updates on progress and provides enough time for significant changes in emissions trends to be observed. Furthermore, data on emissions, which must include Scope 3 emissions, within an interval of two years can be collected and analysed correctly to identify key strategic changes in policy and other factors.

4. When should specified public bodies be required to submit their first mitigation report?

- By end of October 2025
- Later than October 2025
- Earlier than October 2025

If you chose 'Later' or 'Earlier' than October 2025 - please tell us your PREFERRED MONTH and YEAR.

Please tell us your REASONS for your chosen response.

Several public bodies in NI are in the first data collection stage for their greenhouse gas emissions. Currently, the data gathering is focused on Scope 1 and 2 emissions for most of them, and Scope 3 is in its initial phase for a few. Therefore, if the interval of reporting on emissions/mitigation action were two years, the ideal date for public bodies to start collecting or implementing their data would be October 2023.

This would give time to public bodies to harness and review their information and to contact external service providers like Sustainable NI to support and guide them in collecting initial data and information to feed their reports.

5. Do you agree that the time period for which emissions data must be provided, by specified public bodies in their mitigation reports, should cover financial years? (i.e. periods from 1st April to 31st March)

Yes

No

If you chose 'No' - please tell us your SUGGESTED ALTERNATIVE.

Please tell us your REASONS for your chosen response.

We believe the data collection on emissions should be provided on a financial year basis. However, it would be convenient to align it with the data on emissions provided by the Department for Business, Energy and Industrial Strategy (BEIS), which is not based on a financial year approach.

The estimates produced by the Greenhouse Gas Inventory Team at BEIS, on which the Greenhouse Gas Inventory for Northern Ireland is also currently based, cover calendar years. At the UK level, estimates are provided quarterly, so the approach that could be used by public bodies in Northern Ireland for data collection should follow that model.

Using the same system would guarantee consistency, facilitate comparability, and avoid issues that could arise in particular circumstances like the Covid-19 Pandemic, where three-quarters of 2020 were highly impacted, and therefore annual figures were skewed.

6. If you have any other views on the frequency and timing of reporting, which should be set under the future regulations, please provide them below.

Other views on the FREQUENCY of reporting.

N/A

Other views on the TIMING of reporting.

N/A

7. How do you think the specified public bodies (who will have a duty to report under the regulations) should be identified?

- A criteria-based proportionality approach should be applied
- An exemptions approach should be applied
- A different approach should be applied

If you chose 'a different approach' - please DESCRIBE THE APPROACH which you think should be applied.

Please tell us your REASONS for your chosen response.

We believe that a criteria-based proportionality approach, as explained and presented in sections 4.4 and 4.5 of the Consultation Document, should be used to identify public bodies that have large estates and large staff numbers, high impact and influence over a range of policy areas and provision of services, significant expenditure, audit or regulatory functions.

Climate change adaptation and mitigation progress reporting should be considered organisational priorities for such bodies.

SNI would like to encourage any system that lets other smaller bodies, and the private sector, access optional reporting, particularly when there is a partnership and collaboration with any of the public bodies called to report.

8. If a criteria-based proportionality approach is used in the future regulations, which criteria do you think should be included for specifying public bodies?

Please tick all that apply.

- High impact
- High influence
- Large estates
- Large numbers of staff
- Large expenditure
- Auditing or regulatory functions
- Critical/key infrastructure or service provider
- Other

If you chose 'Other' - please describe what you think the criteria should be.

If you have any comments on your chosen response, please provide them below.

9. Do you agree that all of the public bodies listed, in the schedule of the example draft regulations, should be required to report under the future regulations?

The example draft regulations can be viewed in annex 3 of the full-length consultation, or appendix 1 of the abridged version.

- Yes – all
- Yes – but additional bodies should be included
- Partially agree – but some bodies should be removed/not specified
- No – none of these bodies

Please describe any CHANGES which you think should be made to this list.

Please provide your REASONS for any changes which you think should be made to the list.

10. Please note - question 10 has been omitted here, as it only seeks information from North/South Implementation Bodies.

11. Do you think that the future regulations should allow flexibility for public bodies to share data and information with each other, to help them comply with their reporting duties?

- Yes
- No
- Don't know

Please tell us your REASONS for your chosen response.

In Scotland, in addition to reporting on their activities and progress, public bodies are also expected to work collaboratively to address climate change and to support more comprehensive efforts to build resilience to climate impacts.

We strongly believe that the flexibility to share data and information would support consistency and improve collaboration and coordination in addressing climate change issues.

The Scottish Government has developed several initiatives to support information sharing and cooperation between public bodies, from forums to networks. Sustainable NI in Northern Ireland could comply with the secretariat role for these public sector forums, having over 20 years of experience coordinating the Sustainable Development Forum for local authorities and public bodies and facilitating knowledge sharing and solutions to challenging gaps.

Data and information sharing with the appropriate guidance can support collaboration, consistency, and capacity building on public sector climate action.

12. Do you think that the future regulations should allow flexibility for two or more public bodies to provide a single, joint report?

- Yes
- No
- Don't know

Please tell us your REASONS for your chosen response.

Northern Ireland is a small territory, and a joint collaborative approach to climate action should be a priority. Public bodies should be invited to cooperate to identify tools and methods for tackling climate change.

In Scotland, the Sustainable Scotland Network (SSN) Secretariat works with colleagues in the Edinburgh Climate Change Institute to prepare consistent carbon scenario planning, to explore how public bodies can work together better. SNI has a similar role in Northern Ireland on a smaller scale; however, this could be strengthened by extending the existing Sustainable Development Forum to all public bodies identified in this consultation.

Working collaboratively can help reduce the duplication of effort and resources and provide a broader and integrated approach to climate reporting.

In Scotland, through the 2009 Act, and in the Republic of Ireland, the Irish National Adaptation Framework, joint reports can be submitted and are indeed encouraged without omitting responsibilities to meet reporting obligations of individual public bodies. Therefore, broader collaborative reporting crossing the boundaries of jurisdictions and control can favour more detailed information on progress in a geographical area and can facilitate the commission of coordinated work to provide aligned and consistent data using the same methodology, guaranteeing comparability and better risk management.

In addition, it can offer opportunities to access financial support to implement existing initiatives or take action when identified and required. However, there are issues related to data sharing, confidentiality, and consistency of reporting when preparing joint reports since each public body may have its data management policies and practices.

Therefore, it is crucial for the participating public bodies to establish clear guidelines and protocols for data sharing, confidentiality, and consistency of reporting before embarking on joint reports. We strongly advise that these guidelines related to collaborative reporting should be specified in regulations devised by the executive in a framework.

13. Which format do you think the future regulations should require reports to be submitted in?

- Online portal
- Electronic form & email
- Other

If you chose 'Other' - please provide details in the box below.

14. Where do you think the future regulations should require reports to be published?

- On the DAERA website only
- On the specified public bodies' websites only
- On both DAERA and the specified public bodies' websites

Questions 15 & 16 relate to the example draft reporting template provided in annex 5 of the full-length consultation, or appendix 2 of the abridged version.

Consultees are reminded that the future regulations must stay within the scope of section 42 of the Act (covered in section 1.6 of the full-length consultation), and any future reporting template would be based on the content of the regulations.

15. Do you think that your organisation could currently provide the level of detail requested in the example draft reporting template?

	Could currently provide all of the detail	Could currently provide some of the detail	Could currently provide none of the detail
Part 1 – Profile of Organisation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part 2 -Climate Change Management and Governance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part 3.1 – Climate Change Risk Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Part 3.2. – Adaptation Action Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Part 4.1 – Baseline Year and Emissions Statements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Part 4.2 – Mitigation Action Plan (i.e. Emissions Reduction Plan)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part 5 – Validation of Report	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain your answer.

SNI is not a public body but an independent body specialising in sustainability and climate change. Our expertise supports the public sector to work towards net zero emission targets by 2050.

Consequently, our answer to this question is mainly based on the collaboration and consultancy work SNI has provided to some of the local authorities and public bodies in Northern Ireland; we would like to highlight that some public bodies have collected initial baseline year emissions.

However, more detailed analysis and collection of Scope 1 and 2 emissions are still required, and Scope 3 data emissions must be collected for most of them.

16. Are there any questions in the example draft reporting template, which you think should be amended, removed or any further questions to be added?

In the list below, please select all options which reflect your views.

- Amend questions
- Remove questions
- Further questions to be added
- None

If you think that any questions should be AMENDED, please indicate below which questions these would be, and how you think they should be amended.

3.1 question f) Has the organisation calculated how each risk might change, by the years 2050 and 2100, in light of various climate scenarios? If yes, describe.

3.2 Adaptation Action Plan – question a) point vii. The metrics used to assess progress in the management of climate-related risks should be listed to facilitate compliance.

3.2 question c) – co-benefits for reducing emissions should be listed, as examples to consider, along with potential risks associated to adaptation actions.

If you think that any questions should be REMOVED, please indicate below which questions these should be.

If you think that any questions should be ADDED, please indicate below which questions these should be.

Please provide your REASONS for any changes which you think should be made.

SNI consider these open questions challenging to manage without incurring the risk of losing precious information and data.

When reporting it is important to provide options from which to decide, to guarantee consistency. In the reporting template for public bodies in Scotland the adaptation questions are the same as the ones suggested in this consultation and Listing potential scenarios, metrics, benefits and risks can certainly facilitate and speed up the reporting process and make easier the completion of the report also by non-expert that might contribute to redacting the document.

Undertaking a risk assessment is a key step for public bodies to identify and take action to reduce the impacts of climate change, and it requires substantial work of coordination and cross-departmental collaboration.

We are convinced that the current template does not allow for sufficient collation of reliable comparable information, in particular on having the same methodologies used by all public bodies for key data and information. While it is good to be flexible and allow public bodies to report a wide range of activity, it is important to learn from experience, with a focus on reporting for a purpose and ensure useful analysis of the reports is relatively straightforward.

17. What type of support do you think may be required to help specified public bodies meet their reporting duties under the future regulations?

(Please tick all that apply)

- Guidance document
- Training for staff
- Other

If you chose 'Other' - please describe your SUGGESTED ALTERNATIVE.

We envision user-friendly tools to facilitate emissions calculation and analyse the necessary progress and reductions in emissions.

Video tutorials, webinars, and events such as 'how to' clinics.

Please tell us your REASONS for your chosen response.

The climate risk assessment and reporting template should be presented in a user-friendly format to provide accessibility and create a flow of information that is easy to compare and understand. If the reports are going to be published, it is essential that the public can have access to it and understand the progress made without excessive use of jargon.

Video tutorials, webinars, and events such as 'how to' clinics should also be considered to ensure adequate support is provided and that reports are submitted within the expected deadlines.

18. Should public bodies be required to validate the information in their reports before they are submitted to DAERA under the future regulations?

For example, a requirement for reports to be signed off by the organisation's senior management, etc.

- Yes
- No
- Don't know

If you chose 'Yes' - please specify WHAT TYPE of validation you think should be required.

SNI strongly believes that a combined system of an external independent validation process by an independent body and a peer validation process is fundamental for producing a high-quality review of reporting and climate assessments.

We highly recommend setting a standard validation process that would merge the expertise of an external assessor and the support from a peer body, which provides a sense check of the report by an individual with expertise or knowledge of the reported data and information and at the same time is familiar with the functions and activities of the organisation.

It is also an opportunity to improve knowledge sharing and evolve good practice to secure consistency of information and comparability besides accurate and trusted figures.

Please provide your REASONS or any further comments.

Validation is critical to the quality of data and information provided in the reports. It is also a good practice to avoid legal risks and reputational damage due to inaccuracies or inconsistencies.

We recognise the importance of validating information, and we strongly advise considering an independent body of the like of Sustainable Northern Ireland, which would be more than adequate to provide such a service to public bodies due to the long experience in working with and assisting them in implementing strategic actions to promote sustainability and carbon emissions reduction, along with a current advisory role in climate action plans and sustainability/climate auditing experience.

The combination between an external assessor and peer-review support is already embedded in our work with public bodies. We envisage this as a natural continuation and implementation of something already established.

19. If the future regulations place climate change reporting duties on your organisation, please provide an estimate of what the resource implications might be.

Sustainable NI cannot estimate the resource implications of climate change reporting duties but can provide a general overview.

The level of resources required will depend on the size of the public body and the scope of the assessment. The size and complexity of the public body are relevant. Larger public bodies with a more diverse range of activities and operations may require more resources to report on climate change. We consider the implication of climate assessment being resource-intensive in terms of staff time, expertise, data collection and analysis. This implies allocating additional resources to their climate change teams and the involvement of external experts to support the assessment process as previously mentioned.

Besides that, there is also the component of a consultancy most likely to be engaged in preparing risk assessments, which will add more costs to public bodies unless the assessment is completed as a partnership of public, private and third-sector stakeholders across the area of jurisdiction of the public body where contributes to the analysis and the costs come from more than one party.

To estimate the resources needed for reporting on climate change, public bodies can undertake a scoping exercise to identify the essential requirements and resource implications.

Some specific resource implications of reporting on climate assessments include:

1. Data collection and analysis: Public bodies may need to collect and analyse data on their greenhouse gas emissions, energy use, and other relevant indicators to inform their assessment. This can require significant staff time and expertise, mainly if the data is unavailable. Additional workloads might mean additional staff to be hired or existing staff to be retrained.
2. Stakeholder engagement: Public bodies may need to engage with stakeholders, such as local communities or industry groups, to gather input on the potential impacts of climate change and the effectiveness of adaptation and mitigation measures. This can require additional staff time and resources to organise meetings and consultations.
3. Reporting and communication: Public bodies must prepare reports and communicate their findings to internal and external stakeholders. This can involve significant staff time and resources to develop clear and concise messaging and ensure the reports are accessible and understandable.
4. Implementation: Once the assessment is completed, public bodies may need to allocate additional resources to implement adaptation and mitigation measures. This can involve capital investment in infrastructure or changes in operational practices, which can require significant financial resources.

It is difficult to provide a specific number as the cost of preparing a climate change report may vary based on the abovementioned factors.

It is important to draw attention to the opportunities, from risk mitigation to funding and grants to support climate action, that can lead to financial savings by leveraging external funding sources and minimising potential financial losses due to damages and service disruptions that climate change may cause in a business-as-usual scenario.

20. If you have any further comments in respect of any of the issues raised in this consultation, please provide them below.

21. If you have any other comments on any important issues, which you feel have not been adequately covered in this consultation, please provide them below.

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